

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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David E. Patton
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MEMO ENDORSED

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

October 21, 2020

By ECF

Honorable Valerie Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 10/22/2020

Re: *United States v. Martin Reyes*, 20 Cr. 159 (VEC)

Dear Judge Caproni:

I write with the consent of the Government and Pretrial Services to request permission for Martin Reyes to travel to West Orange, New Jersey on October 26, 2020 for a surgery on his cervical spine. The outpatient procedure will take place at the Mountain Surgery Center, and Mr. Reyes expects to return home that same day. I further request that Mr. Reyes be permitted to have his ankle monitor removed for the day of the surgery, in case he is required to undergo any X-rays or MRIs. The Government and Pretrial consent to this request as well.

On October 15, 2020, Mr. Reyes pleaded guilty to one count of narcotics conspiracy, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846. Mr. Reyes's Pretrial Officer, Ashley Cosme, reports that he has remained in full compliance with his bail conditions without any violations since the date of his release.

Application GRANTED.

SO ORDERED.



10/22/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Ariel Werner

Ariel Werner

Assistant Federal Defender

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cc: Juliana Murray, Assistant U.S. Attorney

Ashley Cosme, U.S. Pretrial Services Officer